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4 Attorney for Plaintiff

5 **UNITED STATES DISTRICT COURT**  
6 **DISTRICT OF NEVADA**

8 FRANK UNDERHILL, JR., an individual,  
9 Plaintiff

10 vs.

11 FOR THE EARTH CORPORATION, an  
Arizona Corporation; NELSON GRIST, an  
12 individual; DOES I through X, inclusive; and  
ROE ENTITIES XI through M, inclusive,  
13 Defendants

Case No.: 2:21-cv-01287-CDS-VCF

**STIPULATION TO EXTEND DEADLINE  
TO FILE RESPONSE TO MOTION TO  
ENFORCE**

**(FIRST REQUEST)**

14 Defendants Integrity Health Corporation f/k/a For The Earth Corporation (“FTEC”) and  
15 Nelson Grist (“Defendants”), by and through their counsel of record, Jackson Lewis, P.C., and  
16 Plaintiff Frank Underhill, Jr. (“Plaintiff”), by and through his counsel of record, Law Office of Byron  
17 Thomas, submit the following Stipulation as follows:

18 1. Defendants filed a Motion to Enforce on or about January 13, 2023 (ECF No. 24;  
19 ECF No. 36).

20 2. The Response is due on January 27, 2023. The parties have agreed to extend the  
21 deadline to respond to the Motion to Enforce to February 3, 2023. To accommodate attorney  
22 workload, schedule, and illness.

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3. This stipulation is entered into in good faith and not for purposes of delay, and this is the parties first request.

Dated this 27th day of January, 2023.

LAW OFFICE OF BYRON THOMAS

JACKSON LEWIS P.C.

/s/ Byron E. Thomas

/s/ Kyle J. Hoyt

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*Attorneys for Defendants*

*For The Earth Corporation and Nelson Grist*

**ORDER**

IT IS SO ORDERED:

  
\_\_\_\_\_  
United States District Judge

Dated: January 30, 2023